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June 18, 2025

**VIA ECF**

Hon. Ramon E. Reyes, Jr.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**RE:** *Konopka v. Pace Plumbing Corp. et al.*, 25 CV 811

Dear Judge Reyes:

This firm represents the Plaintiffs Trustees of the Plumbers Local Union No. 1 Welfare Fund, Trade Education Fund, and 401(k) Savings Plan (the “Funds”) in the above-referenced action. We write with the consent of all other Plaintiffs and Defendant Aterian Investment Management, LP (“Aterian”) to respectfully request an adjournment of the pre-motion conference hearing scheduled for Monday, June 23, 2025 at 12:00 p.m. The parties also respectfully request that the in-person conference be converted to a telephone conference.

Aterian is in the process of producing informal documents it contends support dismissal of the claims against it. Additionally, Virginia & Ambinder, LLP (“V&A”) is in the process of transitioning out as counsel for the Funds. Interim counsel is expected to be admitted to the Eastern District by the end of June, at which point V&A will move to withdraw. Moreover, Aterian’s counsel has pre-scheduled travel in August, making in-person attendance impractical. In light of the foregoing, the parties request that the pre-motion conference be adjourned to on or after August 4, 2025.. This is the parties’ first request for an adjournment of the pre-motion conference. No other deadlines would be affected if the request is granted.

Respectfully submitted,

/s/Adrianna R. Grancio

Adrianna R. Grancio, Esq.



Cc: All Counsel of Record (via ECF)

Diana Cohn, Esq., Funds' Interim Counsel (via email)

Rebecca Richardson, Esq., Funds' Interim Counsel (via email)

Hannah Uricchio, Esq., Funds' Interim Counsel (via email)